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VIA ECF

Honorable Lorna G. Schofield
United States District Judge
40 Centre Street
New York, NY 10007

April 13, 2023

Re: Campbell v. British Isles Incorporated
Case No. 1:22-cv-9940-LGS- Status Letter

Dear Judge Schofield:

Plaintiff submits this status letter, in accordance with Rule IV (A)(2) of Your Honor's individual rules. Plaintiff apologizes for the repeated oversight in submitting this letter, as it was neither purposeful nor deliberate. After sending a draft of this letter to defense counsel for review and approval, an away message was received stating that the office of Stein & Nieporent is closed on April 12th and 13th. As such, Plaintiff is submitting this letter individually.

As per Rule IV(A)(2), the status of the matter is as follows:

- (a) The Parties have yet to exchange discovery requests and responses herein.
- (b) Plaintiff filed a Complaint on November 22, 2022, and Defendant filed its Answer on January 9, 2023.
- (c) No motions have been filed, nor are any currently pending.

It is Parties' full intention to complete fact discovery by the so-ordered deadline of May 25, 2023, and to complete expert discovery by July 10, 2023, as the majority of the issues herein rest on expert testimony.

Separately, the Plaintiff respectfully requests that the matter be referred to the District's Mediation Program to facilitate resolution. While a referral to mediation had already been issued, the Parties were unable to agree on a mutually agreeable date. The Parties will be sure to abide by the deadlines imposed by a new referral, should Your Honor grant it.

Plaintiff thanks the Court for its attention and consideration herein.

Respectfully submitted,

Mars Khaimov, Esq.

